

## Permitting Decisions - Bespoke Permit

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We have decided to grant the permit for Harriet's Farm Poultry Unit operated by Poolham Poultry Limited.

The permit number is EPR/WP3325LK.

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

The installation is operated by Poolham Poultry Limited and comprises eight poultry houses, numbered one to eight. The eight poultry houses provide a combined capacity for 400,000 broiler bird places. Poultry houses number one to eight are ventilated by roof fans with an emission point higher than 5.5 metres above ground level and an efflux speed greater than 11 metres per second and heated by LPG heaters. This is a greenfield site.

### Purpose of this document

This decision document provides a record of the decision-making process. It

- highlights [key issues](#) in the determination
- summarises the decision making process in the [decision considerations](#) section to show how the main relevant factors have been taken into account
- shows how we have considered the [consultation responses](#)

Unless the decision document specifies otherwise, we have accepted the applicant's proposals.

Read the permitting decisions in conjunction with the environmental permit. The introductory note summarises what the permit covers.

# Key issues of the decision

## Intensive Rearing of Poultry or Pigs BAT Conclusions document

The Best Available Techniques (BAT) Reference document (BREF) for the Intensive Rearing of Poultry or Pigs (IRPP) was published on 21<sup>st</sup> February 2017. There is now a separate BAT Conclusions document which sets out the standards that permitted farms will have to meet.

Now the BAT Conclusions are published, all new installation farming permits issued after 21<sup>st</sup> February 2017 must be compliant in full from the first day of operation.

There are some additional requirements for permit holders. The BAT Conclusions include BAT-Associated Emission Levels (BAT AELs) for ammonia emissions, which will apply to the majority of permits, as well as BAT AELs for nitrogen and phosphorus excretion.

For some types of rearing practices, stricter standards apply to farms and housing permitted after the BAT Conclusions were published.

### BAT Conclusions review

There are 34 BAT Conclusion measures in total within the BAT Conclusion document dated 21<sup>st</sup> February 2017.

The Applicant has confirmed their compliance with all BAT conditions for the new installation in their document reference Harriet's Farm Poultry Unit and dated 11/04/2025, which has been referenced in Table S1.2 - Operating Techniques, of the permit.

The following is a more specific review of the measures the Applicant has applied to ensure compliance with the above key BAT measures:

#### BAT 3 Nutritional management - Nitrogen excretion

The Applicant has confirmed it will demonstrate that the installation can achieve levels of nitrogen excretion below the required BAT AEL of 0.6kg N/animal place/year and will use BAT 3a technique reducing the crude protein content.

#### BAT 4 Nutritional management - Phosphorus excretion

The Applicant has confirmed it will demonstrate that the installation can achieve levels of phosphorus excretion below the required BAT AEL of 0.25kg P<sub>2</sub>O<sub>5</sub>/animal place/year and will use BAT 4a technique reducing the crude protein content.

### **BAT 24 Monitoring of emissions and process parameters - Total nitrogen and phosphorus excretion**

Table S3.3 of the permit concerning process monitoring requires the Operator to undertake relevant monitoring that complies with these BAT Conclusions.

This will be verified by means of manure analysis and reported annually.

### **BAT 25 Monitoring of emissions and process parameters – Ammonia emissions**

Table S3.3 of the permit concerning process monitoring requires the Operator to undertake relevant monitoring that complies with these BAT Conclusions.

The Applicant has confirmed they will report the ammonia emissions to the Environment Agency annually by utilising estimation by using emission factors.

### **BAT 27 Monitoring of emissions and process parameters - Dust emissions**

Table S3.3 of the permit concerning process monitoring requires the Operator to undertake relevant monitoring that complies with these BAT Conclusions.

The Applicant has confirmed they will report the dust emissions to the Environment Agency annually by utilising estimation by using emission factors.

### **BAT 32 Ammonia emissions from poultry houses - Broilers**

The BAT AEL to be complied with is 0.08 kg NH<sub>3</sub>/animal place/year. The Applicant will meet this as the emission factor for broilers is 0.024 kg NH<sub>3</sub>/animal place/year.

The installation does not include an air abatement treatment facility; hence the standard emission factor complies with the BAT AEL.

## **Detailed assessment of specific BAT measures**

### **Ammonia emission controls – BAT Conclusion 32 broilers**

A BAT Associated Emission Level (AEL) provides us with a performance benchmark to determine whether an activity is BAT. The BAT Conclusions include a set of BAT AELs for ammonia emissions to air from animal housing for broilers.

All new bespoke applications issued after the 21<sup>st</sup> February 2017, including those where there is a mixture of old and new housing, will now need to meet the BAT AEL.

## Industrial Emissions Directive (IED)

This permit implements the requirements of the European Union Directive on Industrial Emissions.

### Groundwater and soil monitoring

As a result of the requirements of the Industrial Emissions Directive, all permits are now required to contain a condition relating to protection of soil, groundwater and groundwater monitoring. However, the Environment Agency's H5 Guidance states that it is only necessary for the Operator to take samples of soil or groundwater and measure levels of contamination where there is evidence that there is, or could be existing contamination and:

- The environmental risk assessment has identified that the same contaminants are a particular hazard; or
- The environmental risk assessment has identified that the same contaminants are a hazard and the risk assessment has identified a possible pathway to land or groundwater.

H5 Guidance further states that it is **not essential for the Operator** to take samples of soil or groundwater and measure levels of contamination where:

- The environmental risk assessment identifies no hazards to land or groundwater; or
- Where the environmental risk assessment identifies only limited hazards to land and groundwater and there is no reason to believe that there could be historic contamination by those substances that present the hazard; or
- Where the environmental risk assessment identifies hazards to land and groundwater but there is evidence that there is no historic contamination by those substances that pose the hazard.

The site condition report (SCR) for Harriet's Farm Poultry Unit dated 11/04/2025 demonstrates that there are no hazards or likely pathway to land or groundwater and no historic contamination on site that may present a hazard from the same contaminants. Therefore, on the basis of the risk assessment presented in the SCR, we accept that they have not provided base line reference data for the soil and groundwater at the site at this stage and although condition 3.1.3 is included in the permit no groundwater monitoring will be required.

## Odour management

Intensive farming is by its nature a potentially odorous activity. This is recognised in our 'How to Comply with your Environmental Permit for Intensive Farming' EPR 6.09 guidance.

Condition 3.3 of the environmental permit reads as follows:

"Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the Operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour."

Under section 3.3 of the guidance, an Odour Management Plan (OMP) is required to be approved as part of the permitting process if, as is the case here, sensitive receptors (sensitive receptors in this instance excludes properties associated with the farm) are within 400m of the installation boundary. It is appropriate to require an OMP when such sensitive receptors have been identified within 400m of the installation to prevent or, where that is not practicable, to minimise the risk of pollution from odour emissions.

There is one receptor within 400m of the installation, however this has been confirmed by the operator to be a warehouse owned by the landowner (not operator owned) that is used for approximately an hour per month as a machinery storage facility. Therefore, we conclude that an OMP is not required for assessment. A plan was submitted but has not been assessed. The operator has provided an odour risk assessment. Condition 3.3.2 has been added to the permit to ensure an OMP is provided if odour problems arise from this site in the future.

## Noise management

Intensive farming by its nature involves activities that have the potential to cause noise pollution. This is recognised in our 'How to Comply with your Environmental Permit for Intensive Farming' EPR 6.09 guidance.

Condition 3.4 of the permit reads as follows:

"Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the Operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan, to prevent or where that is not practicable to minimise the noise and vibration".

Under section 3.4 of the guidance, a Noise Management Plan (NMP) is required to be approved as part of the permitting process if, as is the case here, sensitive

receptors (sensitive receptors in this instance excludes properties associated with the farm) are within 400m of the installation boundary. It is appropriate to require a NMP when such sensitive receptors have been identified within 400m of the installation to prevent or, where that is not practicable, to minimise the risk of pollution from noise emissions.

There is one receptor within 400m of the installation, however this has been confirmed by the operator to be a warehouse owned by the landowner (not operator owned) that is used for approximately an hour per month as a machinery storage facility. Therefore, we conclude that an NMP is not required for assessment. A plan was submitted but has not been assessed. The operator has provided a noise risk assessment. Condition 3.4.2 has been added to the permit to ensure an NMP is provided if noise problems arise from this site in the future.

## **Dust and bioaerosols management**

The use of Best Available Techniques and good practice will ensure minimisation of emissions. There are measures included within the permit (the 'Fugitive Emissions' conditions) to provide a level of protection. Condition 3.2.1 'Emissions of substances not controlled by an emission limit' is included in the permit. This is used in conjunction with condition 3.2.2 which states that in the event of fugitive emissions causing pollution following commissioning of the installation, the Operator is required to undertake a review of site activities, provide an emissions management plan and to undertake any mitigation recommended as part of that report, once agreed in writing with the Environment Agency.

In addition, guidance on our website concludes that Applicants need to produce and submit a dust and bioaerosol management plan beyond the requirement of the initial risk assessment, with their applications only if there are relevant receptors within 100 metres including the farmhouse or farm workers' houses. Details can be found via the link below:

[www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit#air-emissions-dust-and-bioaerosols](http://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit#air-emissions-dust-and-bioaerosols).

There is one receptor within 100m of the installation, however this has been confirmed by the operator to be a warehouse owned by the landowner (not operator owned) that is used for approximately an hour per month as a machinery storage facility. Therefore, we conclude that a dust and bio-aerosol management plan is not required for assessment. A plan was submitted but has not been assessed. We are satisfied that the measures outlined in the application will minimise the potential for dust and bioaerosol emission from the installation.

## Standby generator

There is one standby generator with a net thermal rated input of 0.97 MWth and it will not be tested more than 50 hours per year or operated (including testing) for more than 500 hours per year (averaged over 3 years) for emergency use only as a temporary power source if there is a mains power failure.

## Ammonia

The Applicant has demonstrated that the housing will meet the relevant NH<sub>3</sub> BAT AEL.

There are no Special Areas of Conservation (SAC), Special Protection Areas (SPA) or Ramsar sites located within 5 kilometres (km) of the installation boundary. There are two Sites of Special Scientific Interest (SSSI) located within 5 km of the installation boundary. There are also four Local Wildlife Sites (LWS), one Ancient Woodland (AW) and no Local Nature Reserves (LNR) within 2 km of the installation boundary.

## Ammonia assessment – SSSI

The following trigger thresholds have been applied for assessment of SSSIs:

- If the process contribution (PC) is below 20% of the relevant critical level (CL<sub>e</sub>) or critical load (CL<sub>o</sub>) then the farm can be permitted with no further assessment.
- Where this threshold is exceeded an assessment alone and in combination is required. An in-combination assessment will be completed to establish the combined PC for all existing farms identified within 5 km of the SSSI.

Initial screening using the ammonia screening tool version 4.6 (dated 01/04/2025 and rescreened 21/01/2026) has indicated that emissions from Harriet's Farm Poultry Unit will only have a potential impact on SSSIs with a precautionary CL<sub>e</sub> of 1 µg/m<sup>3</sup> if they are within 1,318 metres of the emission source.

Beyond 1,318m the PC is less than 0.2 µg/m<sup>3</sup> (i.e. less than 20% of the precautionary 1 µg/m<sup>3</sup> CL<sub>e</sub>) and therefore beyond this distance the PC is insignificant. In this case all SSSIs are beyond this distance (see table below) and therefore screen out of any further assessment.

Where the precautionary level of 1 µg/m<sup>3</sup> is used and the PC is assessed to be less than 20%, the site automatically screens out as insignificant and no further assessment of CL<sub>o</sub> is necessary. In this case the 1 µg/m<sup>3</sup> level used has not

been confirmed by Natural England, but it is precautionary. It is therefore possible to conclude no likely damage to these sites.

**Table 1 – SSSI Assessment**

<b>Name of SSSI</b>	<b>Distance from site (m)</b>
Woodhall Spa Golf Course	4,475
Moor Farm	5,078*

\*This site is included at > 5km because the screening is based on an approximate centre point of the emissions and includes a buffer distance calculated from this point to the furthest point of the boundary to ensure all nature conservation sites within the threshold distance from the installation boundary have been included in the assessment.

No further assessment is required.

## **Ammonia assessment – LWS / AW**

The following trigger thresholds have been applied for the assessment of these sites:

- If the process contribution (PC) is below 100% of the relevant critical level (CL<sub>e</sub>) or critical load (CL<sub>o</sub>) then the farm can be permitted with no further assessment.

Initial screening using ammonia screening tool version 4.6 (dated 01/04/2025 and rescreened 21/01/2026) has indicated that emissions from Harriet's Farm Poultry Unit will only have a potential impact on the LWS and AW sites with a precautionary CL<sub>e</sub> of 1 µg/m<sup>3</sup> if they are within 452m of the emission source.

Beyond 452m the PC is less than 1 µg/m<sup>3</sup> and therefore beyond this distance the PC is insignificant. In this case all LWSs and Aws are beyond this distance (see table below) and therefore screen out of any further assessment.

**Table 2 – LWS / AW Assessment**

<b>Site</b>	<b>Distance from site (m)</b>
Edlington Scrubbs LWS	883
Twenty Acre Plantation LWS	2,208*
High Dar Wood LWS	2,252*
Foxhall Farm Track Verge LWS	2,293*
High Dar Wood AW	2,251*

\*These sites are included at > 2km because the screening is based on an approximate centre point of the emissions and includes a buffer distance calculated from this point to the furthest point of the boundary to ensure all nature



conservation sites within the threshold distance from the installation boundary have been included in the assessment.

No further assessment is required.

## **Decision considerations**

### **Confidential information**

A claim for commercial or industrial confidentiality has not been made.

The decision was taken in accordance with our guidance on confidentiality.

### **Identifying confidential information**

We have not identified information provided as part of the application that we consider to be confidential.

The decision was taken in accordance with our guidance on confidentiality.

### **Consultation**

The consultation requirements were identified in accordance with the Environmental Permitting (England and Wales) Regulations (2016) and our public participation statement.

The application was publicised on the GOV.UK website.

We consulted the following organisations:

- Local Authority Environmental Protection – Lincolnshire County Council
- UK Health Security Agency (UKHSA)
- Director of Public Health
- Health and Safety Executive

The comments and our responses are summarised in the [consultation responses](#) section.

### **Operator**

We are satisfied that the applicant (now the Operator) is the person who will have control over the operation of the facility after the grant of the permit. The decision was taken in accordance with our guidance on legal operator for environmental permits.

### **The regulated facility**

We considered the extent and nature of the facility at the site in accordance with RGN2 'Understanding the meaning of regulated facility'.

The extent of the facility is defined in the site plan and in the permit. The activities are defined in table S1.1 of the permit.

## **The site**

The Operator has provided plans which we consider to be satisfactory, showing the extent of the site facilities.

The site layout and drainage plan are included in the permit.

## **Site condition report**

The Operator has provided a description of the condition of the site, which we consider is satisfactory. The decision was taken in accordance with our guidance on site condition reports and baseline reporting under the Industrial Emissions Directive.

## **Nature conservation, landscape, heritage and protected species and habitat designations**

We have checked the location of the application to assess if it is within the screening distances, we consider relevant for impacts on nature conservation, landscape, heritage and protected species and habitat designations. The application is within our screening distances for these designations.

We have assessed the application and its potential to affect sites of nature conservation, landscape, heritage and protected species and habitat designations identified in the nature conservation screening report as part of the permitting process.

We consider that the application will not affect any site of nature conservation, landscape and heritage, and/or protected species or habitats identified.

See Ammonia section in the [key issues](#) above for more details.

## **Environmental risk**

We have reviewed the Operator's assessment of the environmental risk from the facility.

The Operator's risk assessment is satisfactory.

## **General operating techniques**

We have reviewed the techniques used by the Operator and compared these with the relevant guidance notes and we consider them to represent appropriate techniques for the facility.

The operating techniques that the applicant must use are specified in table S1.2 in the environmental permit.

The proposed techniques for priorities for control are in line with the benchmark levels contained in the Sector Guidance Note EPR6.09 and we consider them to represent appropriate techniques for the facility. The permit conditions ensure compliance with The Best Available Techniques (BAT) Reference document (BREF) for the Intensive Rearing of Poultry or Pigs (IRPP) published on 21st February 2017.

## **Emission limits**

We have decided that emission limits are required in the permit. BAT AELs have been added in line with the Intensive Farming sector BAT Conclusions document dated 21/02/2017. These limits are included in table S3.3 of the permit.

## **Monitoring**

We have decided that monitoring should be carried out for the parameters listed in the permit, using the methods detailed and to the frequencies specified.

We made these decisions in accordance with Intensive Farming BAT Conclusions document dated 21/02/2017.

Based on the information in the application we are satisfied that the Operator's techniques, personnel and equipment have either MCERTS certification or MCERTS accreditation as appropriate.

## **Reporting**

We have specified reporting in the permit, using the methods detailed and to the frequencies specified.

We made these decisions in order to ensure compliance with the Intensive Farming sector BAT Conclusions document dated 21/02/2017.

## **Management system**

We are not aware of any reason to consider that the Operator will not have the management system to enable it to comply with the permit conditions.

The decision was taken in accordance with the guidance on Operator competence and how to develop a management system for environmental permits.

## **Previous performance**

We have checked our systems to ensure that all relevant convictions have been declared.

No relevant convictions were found.

## **Financial competence**

There is no known reason to consider that the Operator will not be financially able to comply with the permit conditions.

## **Growth duty**

We have considered our duty to have regard to the desirability of promoting economic growth set out in section 108(1) of the Deregulation Act 2015 and the guidance issued under section 110 of that Act in deciding whether to grant this permit variation.

Paragraph 1.3 of the guidance says:

“The primary role of regulators, in delivering regulation, is to achieve the regulatory outcomes for which they are responsible. For a number of regulators, these regulatory outcomes include an explicit reference to development or growth. The growth duty establishes economic growth as a factor that all specified regulators should have regard to, alongside the delivery of the protections set out in the relevant legislation.”

We have addressed the legislative requirements and environmental standards to be set for this operation in the body of the decision document above. The guidance is clear at paragraph 1.5 that the growth duty does not legitimise non-compliance and its purpose is not to achieve or pursue economic growth at the expense of necessary protections.

We consider the requirements and standards we have set in this permit are reasonable and necessary to avoid a risk of an unacceptable level of pollution. This also promotes growth amongst legitimate operators because the standards

applied to the Operator are consistent across businesses in this sector and have been set to achieve the required legislative standards.

# Consultation Responses

The following summarises the responses to consultation with other organisations, our notice on GOV.UK for the public and the way in which we have considered these in the determination process.

The consultation commenced on 10/06/2025 and ended on 08/07/2025.

## Responses from organisations listed in the consultation section

Response received from **UKHSA (dated 26/06/2025)**.

Brief summary of issues raised:

UKHSA have identified emissions to air—specifically bioaerosols, dust (including particulate matter), and ammonia—as the main potential public health concerns.

The agency noted that no sensitive receptors are located within 250 metres of the site and that appropriate mitigation measures have been proposed within the management plans.

Based on the information provided, UKHSA concluded that they have no significant concerns regarding risks to public health from the proposed installation

Summary of actions taken: None due to no concerns raised.

Response received from **Lincolnshire County Council Environmental Health Department (dated 04/07/2025)**.

Brief summary of issues raised:

Lincolnshire County Council have identified key emissions of interest are ammonia, bioaerosols, dust, noise and odour. The applicant has provided suitable mitigation measures across all areas, including litter and bedding management, sealed feed systems, routine inspections, noise controls, odour management (with weekly boundary monitoring), receptor-specific mitigation, and ammonia screening showing low impact. Comprehensive waste, fallen stock, emergency and accident management procedures are also in place.

They have noted the warehouse within 5m as being a sensitive receptor.

Overall, the response concludes that, with permit compliance, the installation presents a low risk to public health, aligning with UKHSA's position.

#### Summary of actions taken:

As a result of our assessment (see the [key issues](#) above for more details), we conclude that the receptor within 5m is not a relevant sensitive receptor due to the warehouse being used for approximately an hour per month and being owned by the landowner (not operator).

The Health and Safety Executive and Director of Public Health were also consulted but no responses were received.

There were no public responses or responses from any other organisations to this consultation.